

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, *et al.*

Plaintiffs,

v.

THE PALESTINE LIBERATION  
ORGANIZATION, *et al.*,

Defendants.

Case No. 18 Civ. 12355 (MKV) (DCF)

**NOTICE OF PUBLIC FILING OF ECF 101  
AND REQUEST TO THE CLERK OF THE COURT  
TO SUBSTITUTE AN UNREDACTED VERSION OF THE FILING**

PLEASE TAKE NOTICE that, pursuant to and in compliance with the Court's prior orders, Intervenor Arnold & Porter Kaye Scholer LLP ("Intervenor") hereby files an unredacted version of ECF 101 and respectfully requests that the Clerk of the Court replace the redacted version of ECF 101 with the attached unredacted version. In support of Intervenor's request to the Clerk of the Court, Intervenor states as follows:

1. On March 11, 2021, the Court entered a Superseding Stipulation and Order Concerning Production of Confidential Documents and Information [ECF 64], which provides, in Paragraph 17, that if a person seeks to file any document disclosing discovery material designated as "Confidential Material," such document shall be filed "on the ECF system in redacted form (the 'Redacted Filing') until the Court renders a decision on any motion to seal," and if the Court denies a timely motion to seal such materials, then the filer person "shall take steps to replace the Redacted Filing with its corresponding unredacted version." ECF 64 ¶ 17.

2. On July 2, 2021, the Court granted Intervenor's motion to intervene, on certain conditions including that the Stipulation and Order be modified to make Intervenor subject to all

provisions of the Stipulation and Order Concerning Production of Confidential Documents and Information. ECF 95.

3. On August 14, 2021, Intervenor filed a letter-motion requesting that certain documents be made public. ECF 101. In compliance with paragraph 17 of the Stipulation and Order Concerning Production of Confidential Documents and Information, Intervenor filed ECF 101 in redacted form.

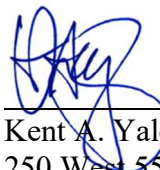
4. On December 6, 2021, Magistrate Judge Freeman issued an Order which, among other things, deferred ruling on the letter-motion pending receipt of additional information. ECF 151.

5. On March 18, 2022, the Court denied all open motions to file under seal. The Court explained: “Having reviewed the unredacted materials, I do not believe the cited interests in confidentiality overcome the ‘strong presumption in favor of public access’ to judicial documents. *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 126 (2d Cir. 2006).” ECF 165 at 12-13.

WHEREFORE, Intervenor respectfully requests that the Clerk of the Court replace the redacted version of ECF 101 with the attached un-redacted version of the filing.

Dated: March 23, 2022  
New York, New York

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